29. Even if a CLEC receives the necessary documentation when it initially submits orders, however, it is essential that the BOC provide -- and adhere to -- a change control process that provides an effective way for implementing changes to the OSS without disrupting the CLEC's operations. Like other technology, a BOC's OSS are dynamic and constantly changing. Even relatively modest changes by a BOC to its OSS could result in rejection of CLEC orders, unless the CLEC is provided with advance notice, consultation, and documentation. Similarly, when problems or defects in the OSS exist, CLECs must have a procedure that gives them an effective opportunity to obtain modifications to the OSS.

30. The Commission, recognizing these principles, has held that a BOC can meet its OSS obligations only if it is "adequately assisting competing carriers to understand how to implement and use all of the OSS functions available to them." Ameritech Michigan Order, ¶ 136; BellSouth South Carolina Order, ¶ 96. BellSouth has not provided such assistance. BellSouth has neither implemented nor followed an effective change control procedure, including adequate advance notification, governing changes that it makes in its OSS. Moreover, BellSouth still fails to provide CLECs with the business rules and other documentation that CLECs need for proper implementation and use of the OSS functions.

31. The instances in which BellSouth has failed to follow adequate change control procedures and provide adequate documentation are so numerous that it would be impossible to discuss them all in a single affidavit. I will therefore limit my discussion to instances that have particularly affected AT&T's efforts to enter the local exchange market through ADL service and combinations of UNEs. As described below, and in Ms. Hassebrock's affidavit, the

lack of change control and of adequate documentation have severely impeded AT&T's entry efforts.

A. BellSouth Has Failed To Implement, or Follow, an Adequate Change Control Procedure.

32. BellSouth can provide nondiscriminatory access only if it and the CLECs establish, and BellSouth adheres to, a uniform, accepted change control process. Such a process is essential to ensure that BellSouth's changes in its OSS, including changes in its documentation for the OSS, can be implemented by a CLEC without disrupting the CLEC's operations.

33. One component of a reasonable change control process requires that BellSouth give CLECs adequate advance notice of such changes. If CLECs receive complete documentation of a change sufficiently in advance of its implementation, not only would they fully be advised of the change, but they would also be able to train service representatives on how to interact with the systems, to plan for added or changed edit routines to the systems, and to make any other necessary modifications to the systems.

34. By contrast, if a BOC does not have a proper change control procedure, CLECs cannot readily use the BOC's systems to complete the electronic transactions necessary to serve customers. Specifically, if documentation adequately setting forth system changes is not provided to CLECs with sufficient notice, a CLEC's orders are likely to be rejected for failing to conform to the BOC's modifications.

35. Although adequate notice and documentation are essential to a change control process, they are not enough. An effective change control process also requires

collaboration between BOC and the CLECs. Because of the complexity of OSS, anything other than minor modifications in the systems affect a CLEC's ability to use them. Thus, successful development and operation of the interfaces requires substantial joint work by the BOC with the CLECs in advance of any important change contemplated by the BOC. This is particularly true because one CLEC's systems may be different from another CLEC's, and it cannot be assumed that a particular OSS change by a BOC can be implemented by all CLECs. Moreover, CLECs may be able to point out problems with the proposed changes and suggest alternatives.

36. The New York PSC recognized the need for a collaborative change control process when it established a collaborative process requiring Bell Atlantic - New York ("BA-NY") to work jointly with the CLECs in an effort to develop and implement BA-NY's contemplated EDI Issue 7 interface for the ordering and provisioning of UNEs and UNE combinations.[15] Without that process, CLECs would have had no assurance that BA-NY's EDI-7, as implemented, would give them the capability to order the UNEs and UNE combinations that they needed.

37. In rejecting BellSouth's Section 271 application for South Carolina, this Commission also recognized the need for an effective change control procedure. In response to the evidence by CLECs that BellSouth had not kept them adequately informed of changes to its

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[15] Case Nos. 97-C-0271, et al., Petition of New York Telephone Company for Approval of its Statement of Generally Available Terms and Conditions Pursuant To Section 252 of the Telecommunications Act of 1996 and Draft Filing of Petition for InterLATA Entry Pursuant to Section 271 of the Telecommunications Act of 1996, Notice of Procedures issued October 23, 1997, pp. 2-3.

OSS functions, the FCC reminded BellSouth of its obligation "'to provide competing carriers with the specifications necessary to instruct [them] on how to modify or design their systems in a manner that will enable them to communicate with the BOC's legacy systems and any interfaces utilized by the BOC for such access.'" BellSouth South Carolina Order, ¶ 164 (quoting Ameritech Michigan Order, ¶ 137) (emphasis added). BellSouth, however, has not heeded the Commission's warning.

38. As Mr. Stacy notes, BellSouth and several CLECs, including AT&T, signed the Electronic Interface Change Control Process document ("the change control document") in April 1998.[16] That process, however, was produced only as a result of regulatory "prodding" of BellSouth by the Georgia PSC. Moreover, the change control document is limited in scope. It encompasses only the existing interfaces, and does not apply to new interfaces until they are being deployed. Stacy OSS Aff., Exh. WNS-CD-7, p. v; Change Control Document, p. 1 (Attachment 3 hereto). Moreover, it does not encompass "defect change requests" -- requests for changes in the OSS that CLECs may make to correct problems that they often experience with BellSouth's business rules, specifications, documentation, USOCs, and edits as they attempt to submit orders into the system. Id.[17] Even to the extent that such requested

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[16] See Stacy OSS Aff., ¶ 231 & Exh. WNS-CD-7; "Electronic Interface Change Control Process," document dated April 14, 1998 ("Change Control Document"), attached hereto as Attachment 3.

[17] The Change Control Document defines "defect (production)" as "a defect found in a production environment when the system is not operating as specified in a baseline business requirements document; that is, required functionality is not there." Change Control Document, (continued...)

changes fall within the change control process, the procedure takes several months to complete from the submission of the change request until its implementation, even under the most optimistic scenario.[18]

39. Despite the limited scope of the change control process, it was certainly AT&T's expectation that this process would encompass both changes sought by BellSouth and those sought by CLECs.[19] A change control process would be of only limited value if it were confined to changes made by BellSouth in response to requests by CLECs, because the

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[17] (...continued)
p. 15 (Attachment 3 hereto).

[18] Under the new change control procedure, an Enhancement Review committee composed of BellSouth and CLECs meets three times annually to review and prioritize change control requests. Stacy OSS Aff., Exh. WNS-CD-7, pp. 1, 15; Change Control Document, pp. 10, 15 (Attachment 3 hereto). The change control calendar agreed to by BellSouth and the CLECs establishes specific dates for all aspects of the process, including cut-off dates for submission of change requests before a particular Enhancement Review meeting. Changes made after the cut-off date will generally be reviewed only at the next subsequent meeting. Under the current change control calendar, the minimum time between the submission of a change control request and the issuance of a "release package" -- a package listing the requests that have been targeted for a scheduled release -- is at least three and one-half months, and could be more than six months. That period does not include the date of actual implementation of the change. Attachment 4 to my affidavit is a copy of the current change control calendar.

[19] In late June, two months after the Change Control Document was signed, BellSouth advised AT&T (for the first time) that it had established a team to address "LEO Guide issues and concerns." BellSouth suggested that this team would handle issues involving the local ordering change control process that were not encompassed by the document. However, BellSouth has never advised AT&T of the membership of the team, the precise responsibilities of the team, the extent to which the team might be able to implement change requests, or the procedures to be followed in presenting issues to the team. In any event, as of the date of the filing of its application BellSouth has not specified to AT&T a process whereby AT&T can present defect change requests or any other requests for changes outside the scope of the Change Control Document.

overwhelming majority of the changes that BellSouth has made have clearly been at BellSouth's instigation, without CLEC involvement. The change control document appears to reflect the intention of the parties that it cover changes sought by BellSouth. For example, both the change request form and the change request clarification response in the document ask whether the requester is a CLEC or BellSouth, and the checklists for both of these forms direct the requester to state "whether Change Request originated at CLEC or BST." Change Control Document, pp. 19, 21, 23-24 (Attachment 3 hereto).[20]

40. Mr. Stacy's testimony, however, indicates that BellSouth considers the Electronic Interface Change Control process inapplicable to the changes that it intends to make for its OSS (except to the extent that the change was requested by a CLEC). He describes the process in terms of "CLEC change requests" and "forms for CLECs to register to participate" in the process, without making any reference to any applicability of the process to BellSouth. Id., ¶¶ 232-233.[21] His discussion of BellSouth-initiated changes is confined to BellSouth's methods of notifying CLECs of changes in advance, such as by letters, the Internet, and meetings with CLECs. Id., ¶¶ 230, 234

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[20] Inexplicably, the CD-ROM version of the change control document that accompanies Mr. Stacy's affidavit does not include these forms and checklists, but simply refers the reader to BellSouth's Web site to access them -- even though the CD-ROM document contains every other change control form that is listed in the document. Compare Stacy OSS Aff., Exh. WNS-CD-7, p. 23 with Change Control Document, pp. 19, 21, 23-24 (Attachment 3 hereto)

[21] See also Application, p. 18 ("BellSouth has introduced a change control process through which CLECs may propose and discuss changes to BellSouth's proposed interfaces").

41. BellSouth's conduct since the execution of the change control document provides further evidence that BellSouth considers the process inapplicable to BellSouth-initiated changes to its OSS. Some of the changes made by BellSouth which I describe below, and which Ms. Hassebrock describes in her affidavit, occurred after the document was executed. Furthermore, although BellSouth has scheduled new releases for its LENS and EDI interfaces in the next few months (such as Release 3.1, which is scheduled for August 15, and Release 4.0, which is scheduled for November 14), BellSouth put none of those changes -- or any other changes it intends to implement -- on the agenda of the Enhancement Review Meeting that was scheduled for July 13, 1998; the agenda contained only changes requested by CLECs [22]

42. Even Mr. Stacy's portrayal of the advance notice and documentation of system changes that BellSouth provides is incorrect. He states that BellSouth "provide[s] CLECs with advance notice and documentation of all proposed system changes" and publishes "major" release systems changes approximately one month in advance of its publication. Stacy OSS Aff., ¶ 230. That, however, has not been AT&T's experience. Often BellSouth advises AT&T of system changes only a few days before the change is implemented, without providing the necessary documentation. For example, on April 10, 1998 (Good Friday), BellSouth posted a notice letter on its web site announcing that on the following Monday, April 13, it would implement Release 2.1 for LENS -- which, by any definition, was a "major system change." One

[22] A copy of the notice and agenda of the Enhancement Review committee meeting scheduled for July 13, 1998, including the change request log for the meeting and the change requests submitted, is attached hereto as Attachment 5. That meeting was the first scheduled under the new change control process.

business day's notice, particularly when the notice is published on Good Friday (a holiday in many states within the BellSouth region), certainly does not constitute sufficient notice for a CLEC to modify its systems to make the necessary changes. Moreover, the April 10 letter was a one-page summary that referred the CLECs to a "LENS 2.1 Work Aid" for additional documentation BellSouth, however, did not post the Work Aid on its Web site until April 29, 1998 -- more than two weeks after the implementation of Release 2.1.[23]

43. The April 10 experience simply illustrates BellSouth's ad hoc notification policy. BellSouth alone decides what changes to make, what changes are "major," and what the advance notice -- if any -- to the CLECs will be. All too often, BellSouth gives little advance notice of a change in its OSS or OSS requirements, or gives no advance notice at all.[24]

44. BellSouth's failure to adhere to an effective change control policy has damaged AT&T's attempts to enter the local exchange market through its two current modes of entry, ADL and UNE combinations. I will discuss four illustrative instances: (1) BellSouth's

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[23] See Customer Letter/Announcement from BellSouth to Competitive Local Exchange Carriers, dated April 10, 1998 (Attachment 6 hereto). A copy of BellSouth's web listing of CLEC Consumer Guides, which lists April 29 as the posting date for Release 2.1, is attached hereto as Attachment 7.

[24] Although Mr. Stacy contends that BellSouth posts user guides on its interconnection Web site, its postings have been highly selective. See Stacy OSS Aff., ¶ 234. For example, after BellSouth posted Issue 4 of Volume I of the LEO Implementation Guide on the Web in October 1997, it did not post another issue of the Guide on the Web until Issue 8 was posted on July 6, 1998. CLECs received the intervening issues only in hard copy draft form. During that period, any CLEC relying solely on the information posted on the BellSouth Web site did not have current, accurate EDI information, since Volume I of the LEO Guide contains the mapping rules for the EDI-7 interface.

unilateral decision to eliminate EDI-6; (2) BellSouth's shifting requirements regarding the use of Universal Service Order Codes ("USOCs") for directory listings orders; (3) orders for complex directory listings; and (4) number portability. In addition, after discussing the related problem of BellSouth's failure to provide CLECs with vital business rules, I present a case study -- on orders for subsequent partial migrations -- that vividly illustrates how the lack of change control and business rules can seriously undermine, if not preclude, competitive facilities-based entry.

1. The Sunsetting of EDI-6

45. BellSouth's unilaterally-determined policy, as described by Mr. Stacy, is to end its support of a particular version of standard OSS software, including EDI, 90 days after the implementation of the new version. Stacy OSS Aff., ¶ 95. BellSouth applied that policy when it "sunsetted" EDI-6 on June 16, 1998 -- 90 days after the professed implementation of EDI-7. It now appears, however, that BellSouth has reduced the "sunsetting" period even further; according to its SGAT in Kentucky, which was filed before the filing of BellSouth's application here, BellSouth will sunset a previous version only 60 days after the new version is implemented, unless the CLEC pays an unspecified fee.[25]

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[25] BellSouth's Kentucky SGAT states:

> CLEC will migrate with BellSouth to new electronic interface system releases. BellSouth will continue to support CLEC on old releases for sixty days after the date of the new release. If CLEC is unable or does not want to migrate within that sixty day period, CLEC will have the option of paying a fee to maintain the old platform.

BellSouth Kentucky SGAT, filed June 19, 1998, p. 8. Relevant pages of the SGAT are attached (continued...)

46. As Ms. Hassebrock describes in her affidavit, and as I describe below (¶¶ 89-109, infra), BellSouth's insistence on sunsetting EDI-6 has had a highly detrimental effect on AT&T's ADL program. Only in May, when AT&T was testing EDI-7 while continuing to submit test ADL orders via EDI-6, did AT&T discover that EDI-7, unlike EDI-6, did not enable AT&T to use the "workaround" arrangement available via EDI-6 for the submission of subsequent migration orders, which are critical to the success of ADL. When BellSouth refused to consider any of the possible solutions suggested by AT&T that would have resolved the problem on EDI-7, AT&T requested BellSouth to continue EDI-6 past the June 16 sunset date. BellSouth replied that it would do so only if AT&T agreed to pay BellSouth $100,000 per month, or $1.2 million per year. Because this price was patently unreasonable, AT&T declined the offer [26] As of the date of BellSouth's application, due to the lack of ordering functionality on EDI-7 and the lack of necessary documentation for the submission of orders by fax, AT&T had no means of sending orders for subsequent partial migrations to BellSouth.

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[25] (continued)
hereto as Attachment 8. The inconsistency between the 90-day period described by Mr. Stacy and the 60-day period described in the Kentucky SGAT is yet another example of BellSouth's failure to define its processes clearly. Whatever the sunsetting or "versioning" policy that BellSouth establishes, CLECs need to know the precise details of that policy -- including the precise duration of the "sunsetting" period -- in order that they may avoid disruption of their operations.

[26] At virtually the same time that it was demanding $1.2 million from AT&T, BellSouth advised four CLECs, including AT&T, that "BellSouth's cost estimates for the support of 2 versions of the EDI map alone are at least $744,000 per year." See letter from W. Scott Schaefer (BellSouth) to Melissa L. Closz (Sprint), et al., dated June 12, 1998 (Attachment 9 hereto). Thus, BellSouth was demanding that AT&T pay a fee more than $450,000 higher than BellSouth's alleged actual cost of keeping EDI-6 in operation.

47. BellSouth's sunsetting policy reflects a lack of collaboration and adequate notice that is essential for effective change control. The policy assumes that all CLECs wish to shift to the newest version of the OSS software. However, many CLECs may prefer to continue using the preexisting version because the conversion costs may be unacceptable or because -- as AT&T experienced with EDI-7 -- the preexisting version may offer certain functionality that the new one does not. Even if the CLEC prefers to convert to the new version, 60 or 90 days may be insufficient to ensure a smooth transition. New software often has deficiencies that take time to correct before the software is suitable for commercial usage. This is particularly the case in the local exchange market, where the emergence of competition is a relatively new development and the technology for giving CLECs access to a BOC's OSS is relatively new -- and the provider of the interface is the chief competitor of the users.

48. BellSouth's assertion that it "will seek the CLECs' reasonable agreement on the date for implementing the newest standard" is misleading, self-serving rhetoric. Id. During the development of the Electronic Interface Change Control document, AT&T and the other participating CLECs stressed the need for BellSouth to reconsider its policy and support CLECs that need additional time to migrate to a new version. BellSouth refused, leaving the CLECs no choice but to file a joint letter to BellSouth formally requesting a change in BellSouth's policy. After delaying its response for almost two months, BellSouth denied the request.[27] The

[27] See letter from Bryan Green (MCI), et al., to Scott Schaefer (BellSouth), dated April 13, 1998 (Attachment 10 hereto); letter from Scott Schaefer (BellSouth) to Melissa Closz (Sprint), et al., dated June 12, 1998 (Attachment 9 hereto).

professed intention of BellSouth to seek the CLECs' "reasonable agreement" is thus virtually meaningless, since BellSouth alone will determine (however arbitrarily) what is "reasonable."

49. The various justifications offered by Mr. Stacy for BellSouth's policy do not withstand scrutiny. Id. It is common practice in the industry to support both the current and immediate past versions of major software programs. For example, in the Bell Atlantic region, Bell Atlantic has agreed to keep available both the new (current) and the preexisting (sunset) versions of EDI until such time as a subsequent version is released into production; only at that point will the sunset version be decommissioned.[28] In the case of the Carrier Access Billing System ("CABS") -- the BOCs have maintained the preexisting version of the interface in effect for far more than 90 days after the new version has been implemented.[29] Moreover, in contrast to BellSouth's practice, the industry follows a structured, ongoing notification process when a new version of CABS is introduced.

50. In any event, Mr. Stacy's assertion that the maintenance of multiple versions of an interface would cause substantial problems is baseless. With respect to data integrity, Mr. Stacy ignores the fact that, in the case of EDI, the ability of one CLEC to support

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[28] See "Telecom Industry Services: Change Management Process," dated May 22, 1998, pp. 3, 56-59 (Attachment 11 hereto).

[29] The CABS Billing Outputs Specification, for example, provides that "[n]o more than two major versions will be valid at one time" -- an implicit recognition that two versions may be in operation at the same time. CABS Billing Outputs Specification, SR-1868, Issue 7, § 4.21 (Feb. 1997).

and use new EDI features is independent of another CLEC. Thus, BellSouth can translate both EDI versions without creating any data integrity problems.

51. Similarly, BellSouth's concerns about the cost of maintaining multiple versions are overstated. In the case of EDI, BellSouth's EDI translators are capable of supporting multiple EDI maps. The older version of the interface map would not require upgrades or changes, and the CLECS using it would already be in production. Given these circumstances, it is unlikely that the costs would be unduly burdensome to BellSouth. By contrast, as AT&T's experience demonstrates, the costs to the CLECs of BellSouth's sunsetting policy are substantial. Indeed, the sunsetting policy -- combined with the limitations of EDI-7 and BellSouth's refusal to develop solutions to those limitations -- has left AT&T worse off in many respects with EDI-7 than it was with EDI-6.

2. <u>USOCs For Directory Listings Orders</u>

52. The changes in BellSouth's policy regarding the inclusion of USOCs in orders for directory listings submitted via EDI illustrates the lack of change control in BellSouth's systems, and the adverse impact that such absence has on CLECs. In December 1997, BellSouth insisted that AT&T include USOCs in EDI orders for directory listings. AT&T objected that requiring the inclusion of USOCs was contrary to applicable industry standards established by the Ordering and Billing Forum ("OBF"). BellSouth, however, adhered to its requirement, and AT&T therefore coded its systems to meet that requirement.

53. On April 3, 1998, however, AT&T received EDI-7 documentation from BellSouth indicating that AT&T should <u>not</u> include USOCs in orders for directory listings.

AT&T recoded its interface accordingly. Yet, on May 11, 1998, BellSouth again altered its position and advised AT&T that BellSouth's systems could not accept orders for directory listings without USOCs until the July 24 release of BellSouth Release 3.0.[30] Until Release 3.0 can be tested, AT&Twill be required to send all of its orders for directory listings by facsimile. This manual procedure raises the risk that AT&T's directory listings will be erroneous or delayed, due to the need for manual processing by BellSouth. Since directory listings are important to customers, the result will be customer dissatisfaction and inconvenience.

54. BellSouth's constant changes in its policy on USOCs have caused AT&T needlessly to expend resources, left AT&T in the position of having to fax orders until BellSouth changes its systems again, and has inconvenienced AT&T customers. Mr. Stacy's defense of BellSouth's conduct is contrary to the facts. Stacy OSS Aff., ¶ 144. Contrary to his assertion, after receiving the BellSouth documentation on April 3 AT&T repeatedly advised BellSouth in meetings regarding directory listings that it would no longer code its systems to send USOCs, based on the documentation.[31]

55. Mr. Stacy's account of the April 7-16, 1998 communications between the parties also misstates the facts. Id. On or about April 7, BellSouth advised AT&T that AT&T had the option of utilizing all or none of the directory listings USOCs. BellSouth, however,

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[30] Copies of the minutes of the April 3, 1998 meeting and May 11, 1998 conference call between AT&T and BellSouth on directory listings ordering are attached hereto as Attachment 12

[31] AT&T, for example, advised BellSouth during a meeting on April 16 and a conference call on May 12 that it would not include USOCs in its EDI orders, based on the BellSouth documentation. Copies of the minutes of these discussions are attached hereto as Attachment 13

demanded an answer within one day, claiming that it needed an immediate answer or risked losing the ability to accommodate changes until August Clearly, AT&T would have preferred not to send USOCs, since AT&T had objected to doing so when BellSouth first required it. However, because AT&T had already coded its systems to send USOCs at BellSouth's insistence, it needed to study whether removing the USOCs from its systems: (1) would delay its market entry; and (2) would be unreasonably costly. Such a study, however, would take several days to complete Because BellSouth was demanding an immediate answer, and because AT&T's systems already had been coded for the USOCs, on April 8 AT&T advised BellSouth of its "interim" decision to send the USOCs in directory listings orders. However, AT&T emphasized that it reserved its right to change its position upon completion of the study.[32] After conducting its analysis, AT&T concluded that the removal would neither delay its market entry nor be prohibitively costly. Thus, on April 16, AT&T advised BellSouth that it would not be sending directory listings USOCs Although BellSouth accepted that decision at the time, less than one month later BellSouth reversed its position and again required the use of USOCs.[33]

56. In fact, Mr. Stacy's own account of the events simply illustrates BellSouth's failure to implement a proper change control procedure. On April 7, BellSouth gave AT&T only one day to decide whether to utilize the directory listings USOCs. Id. Forcing CLECs to make

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[32] See letter from Steven M. Howard (AT&T) to Stephen Travers (BellSouth), dated April 8, 1998 (Attachment 14 hereto); transcript of voice mail from Ray Crafton (AT&T) to Scott Schaefer (BellSouth), dated April 8, 1998 (Attachment 15 hereto).

[33] See minutes of BellSouth-AT&T meeting on April 16, 1998, and conference call on May 11, 1998 on directory listings ordering (Attachments 12 and 13 hereto).

such on-the-spot decisions is unreasonable, particularly where the decision involves a possible systems change.[34]

3. Complex Directory Listings

57. BellSouth has also, without prior notice to AT&T, changed its requirements for the ordering of complex directory listings. These listings, which are frequently used by large businesses, include both the customer's main listed number and the numbers of various departments or sub-organizations of the customer.

58. Until early July, AT&T and BellSouth had agreed upon a method for submission of orders involving complex directory listings. AT&T sent orders with duplicate purchase order numbers ("PONs"), which consist of 16 numeric characters. The first order, which was sent via EDI, indicated the telephone number that needed to be ported; the second order, which was sent by fax, utilized the same PON, followed by the letters "ACS," which indicated that the number was tied to a DID number block -- and thus was part of a complex directory listing.

59. In early July, however, orders sent by AT&T were rejected by BellSouth's systems, even though they followed the agreed-upon duplicate PON procedure. When AT&T investigated the matter, BellSouth advised AT&T that it had implemented a new internal system

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[34] Mr. Stacy makes no attempt to explain why a difference of eight days postponed the availability of the coding changes by nearly four months. Nor does he explain why, if BellSouth needed an immediate answer in April because any delay would leave BellSouth unable to make the appropriate coding changes until August, BellSouth was nonetheless able to advance the implementation date from August to July. Stacy OSS Aff., ¶ 144.

that recognizes only the 16 numeric characters of the PON -- and no longer recognizes any additional alpha characters. As a result, BellSouth's systems fail to recognize the linkage of the orders, and the second order (either the directory listing order or the ported number order) will be rejected. BellSouth provided no notice of this change to AT&T before it was implemented. As of the date of the filing of BellSouth's application, AT&T was able to place orders only for "simple"/main directory listings on ported numbers. As Ms. Hassebrock states in her affidavit, the inability to place orders for complex directory listings puts AT&T at a severe competitive disadvantage in serving large business customers.

4. Number Portability

60. As Ms. Hassebrock explains in her affidavit, BellSouth has impeded the implementation of the use of Route Indexing-Portability Hub ("RI-PH") as the interim number portability ("INP") solution. BellSouth changed its ordering requirements, which had originally provided six-week provisioning intervals, and now takes the position that six weeks may be inadequate. Without specific intervals, AT&T cannot ensure that INP will occur coincident with a cutover in service.[35]

61. Changes by BellSouth have also adversely affected AT&T's plans with respect to permanent number portability (provided via Location Routing Number, or "LRN"). Under the Commission's schedule, permanent number portability must be implemented in certain

[35] In addition, as Ms. Hassebrock describes in her affidavit, BellSouth has been unwilling to allow all of the testing of RI-PH necessary to confirm features conflicts or billing issues.

areas in the BellSouth region, such as Atlanta, on August 31. Implementation will begin in certain other MSAs in the region on October 31 and November 30.

62. Last April, pursuant to a request by AT&T, BellSouth stated that it would make LRN ordering capability available for testing on April 16. However, BellSouth then changed its mind and advised AT&T that LRN orders could not be submitted on EDI, even for testing, until August 31, which is the same day when LRN must be implemented in Atlanta. See Stacy OSS Aff., ¶ 90. This change has deprived AT&T of the opportunity to test EDI for its ability to process LRN orders before LRN is required. To submit actual orders for LRN on EDI without any previous opportunity for testing would run the risk that the orders will not be successfully processed, and threatens the transparent porting that is essential for customer satisfaction. Ms. Hassebrock describes the adverse consequences of BellSouth's change on ADL market entry in her affidavit.

63. In contrast to the unavailability of EDI for LRN testing until August 31, BellSouth will take manual test orders for LRN beginning August 15. Because of the lack of opportunity for prior testing of EDI, AT&T has no choice but to submit orders for LRN manually until EDI has been fully and successfully tested for its LRN ordering capability. The testing, however, may take several months and extend beyond the LRN implementation dates for other cities in the BellSouth region. The manual processing of orders during this period carries the risk that the porting will be performed erroneously or will be delayed, resulting in customer dissatisfaction aimed at AT&T. BellSouth's change of implementation dates thus not only adversely affects CLECs, but jeopardizes the successful implementation of LRN.

B. BellSouth Has Failed To Provide the Necessary Business Rules To CLECs.

64. "Business rules define valid relationships in the creation and processing of orders, as well as numerous other interactions." Ameritech Michigan Order, ¶ 137 n.335. Knowledge of these rules -- which are not reflected in the specifications that BellSouth has made available to CLECs and are unknown to CLECs unless they are otherwise shared by BellSouth -- is essential to the CLECs' ability to place orders through the OSS efficiently and successfully. If an AT&T order violates a format business rule, it is likely to be rejected by BellSouth's systems. By contrast, BellSouth's service representatives have editing checks available in the system that alert them to violations of business rules before they submit orders.

65. Because of the importance of business rules, the Commission has expressly made provision of these rules a part of the BOC's OSS obligations under the competitive checklist. Id., ¶ 137. AT&T, in fact, has requested from BellSouth for more than two years to provide AT&T with the business rules that must be followed to ensure the successful flow-through of orders in the BellSouth systems.

66. Mr. Stacy contends that "CLECs have had all of the business rules necessary to place a correct order with BellSouth" since April 1997. Stacy OSS Aff., ¶ 105. Quite simply, that is not true. In fact, the Commission previously found that BellSouth had not provided the necessary business rules and other pertinent information, and that this failure has led to rejection of substantial volumes of CLEC orders. BellSouth South Carolina Order, ¶ 111. Unfortunately, although BellSouth has provided some additional documentation since the

Commission's decisions, CLECs still do not have complete, accurate business rules. Despite the obvious need for these business rules, and despite its agreement to provide such rules, BellSouth has complied neither with the Commission's requirements nor its own promises.

67. Mr. Stacy, for example, asserts that BellSouth has provided business rules to the CLECs through the LEO Implementation Guide, rules governing the Local Exchange Ordering database, the rules governing LESOG, and the LEO User Requirements for Rejects document. Stacy OSS Aff., ¶¶ 104-105, 127. These materials, however, are only part of the business rules that a CLEC needs. The LEO Implementation Guide, for example, is mostly a generic instruction on the requirements of the standard EDI interface as implemented by BellSouth to reflect only the limits of its EDI gateway. Contrary to Mr. Stacy's assertion, that guide does not contain "the required USOCs/ordering codes and valid combinations" -- as the examples described below demonstrate. Id., ¶ 104. It does not provide the business rules necessary to send error-free orders to BellSouth. It also does not reflect policies of BellSouth being applied to CLEC orders, or the limits and restrictions of the hardware of BellSouth's legacy systems.[36]

68. BellSouth itself has admitted, since the filing of its latest Section 271 application, that the LEO Implementation Guide is inadequate. On July 17, 1998, in response to

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[36] Mr. Stacy also errs in stating that "the requisite information for USOCs and FIDs is readily available" in the LEO Guide and the CLEC USOC Manual. Stacy OSS Aff., ¶ 107. The LEO Guide is replete with inaccuracies, inconsistencies, and omissions. The CLEC USOC Manual does not describe the FIDs that should be used with USOCs in certain situations, or the states in which particular USOCs are valid.

questions by AT&T regarding discrepancies in the LEO Implementation Guide, BellSouth replied that it is "aware that discrepancies do exist in the LEO IG and we are working toward identifying those discrepancies, but this process will take some time."[37]

69. In the same July 17 message, BellSouth disavowed the LEO User Requirements for Rejects document, commonly referred to as the "reject binder," which Mr. Stacy describes as the source for information on the BellSouth error codes that automatically generate a rejection notice. Stacy OSS Aff., ¶ 127 & Exh. WNS-45. Acknowledging that the reject binder has not been updated since its publication last November, BellSouth stated: "Since the reject binder is outdated, please do not use it as a point of reference."[38] This episode is but the latest of AT&T's persistent difficulties with the BellSouth documentation.

70. BellSouth's failure to provide complete business rules has severely impaired AT&T's ability to provide service through combinations of UNEs. Ms. Hassebrock discusses in her affidavit the impact of the lack of adequate business rules on AT&T's attempt to provide ADL service. Furthermore, regardless of the mode of entry, the lack of adequate business rules adversely affects virtually every aspect of CLEC ordering on BellSouth's systems. Examples of such areas are: (1) ordering requirements for UNE combinations; (2) BellSouth's requirements regarding miscellaneous account numbers; (3) disconnect orders; (4) CGI specifications; and (5) directory listings.

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[37] See electronic mail message from Gary Romanick (BellSouth) to Pamela Nelson (AT&T), dated July 17, 1998 (Attachment 16 hereto)

[38] Id. (emphasis added).

1. **UNE Combinations**

71. BellSouth has failed to promulgate adequate business rules that would enable CLECs to place orders successfully for combinations of UNEs. To the extent that BellSouth has provided documentation concerning the ordering of UNE combinations, it has been inconsistent and inadequate. BellSouth has published ordering requirements for combinations in its Manual Ordering Guidelines, its Port/Loop Combination Ordering Requirements, and the LEO Guide. The documents, however, differ substantially with each other in their ordering requirements. A table describing the inconsistencies between the documents is attached hereto as Attachment 17. In view of these inconsistencies, the correct ordering requirements for UNE combinations remain a mystery, and AT&T can do little more than make its "best guess" as to what those requirements really are.

72. Similarly, although BellSouth asserts that CLECs can combine an unbundled loop and unbundled switch through the collocation arrangement which it proposes, BellSouth has provided no instructions as to how CLECs can place electronic orders for individual UNEs that CLECs themselves can combine in a collocated space. Contrary to BellSouth's assertion, those instructions are not set forth in the "three separate manuals" that it cites. See Application, pp. 38-39. At best, the manuals provide instructions for electronic ordering of UNEs outside the context of a collocation arrangement, and at least one of the manuals deals only with ordering by fax or by mail. Thus, the Commission's prior concern that BellSouth has not adequately detailed how CLECs could combine UNEs is still applicable. BellSouth South Carolina Order, ¶ 206.

73. The testing of UNE combinations that AT&T has conducted during 1998 (described infra, ¶¶ 276-277), where as of the date of the filing of BellSouth's application every order that AT&T has attempted to submit through the EDI-7 interface has been rejected by BellSouth's systems, is confirmation that BellSouth has failed to provide the necessary business rules. On April 6, 1998, for example, AT&T sent 13 sample UNE combination orders in EDI mapping format for BellSouth's review. Two weeks after the agreed deadline, BellSouth advised AT&T that four mapping changes to its systems would be appropriate. AT&T coded its systems accordingly. On May 4, 1998, AT&T sent 21 port/loop combination orders to BellSouth -- 17 over the EDI mainframe interface, 3 over EDI-PC, and 1 manually. All three of the EDI-PC orders were rejected.[39]

74. The 17 orders sent via the EDI mainframe on May 4 fared no better. Each order, like the EDI-PC orders, was rejected due to business rules that BellSouth had not previously provided to AT&T. BellSouth advised AT&T that the 17 orders were rejected because they lacked a field identifier ("FID") designating whether the order is for an additional line (an "ADL FID").[40] BellSouth used three different codes in the various error notices

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[39] The rejections of the UNE combination orders on EDI-PC illustrate that, contrary to the impression given by Mr. Stacy, EDI-PC does not have the same functionality as "mainframe" EDI, which at least allows orders for such combinations to be submitted electronically (although BellSouth does not provide end-to-end flow-through capability on EDI for UNE combination orders). See Stacy OSS Aff., ¶ 83. The mapping that BellSouth has provided to AT&T for EDI-PC has always been different from that provided for "mainframe" EDI.

[40] In the context of FIDs, "ADL" refers to a customer who already has an existing line but desires new service, usually an additional line. Since AT&T Digital Link service is also commonly

(continued...)

(including a code describing the error as "insufficient end-user data") to denote what BellSouth ultimately identified as the same error -- the lack of an ADL FID. The ADL FID error code appears in none of the documents that Mr. Stacy cites as BellSouth's business rules, nor do the documents contain any information on how to submit an order so as to avoid this "edit." Id., ¶¶ 104-105. The agreed-upon requirements for EDI-7 also included no requirement that an ADL FID be included on an order. The use of the ADL FID codes was also illogical, since many of the May 4 orders involved simple migrations.

75. Since May 4, and through the July 9 date of BellSouth's filing, many of the additional orders for UNE combinations that AT&T has submitted during testing have been rejected for lack of an ADL FID. Based on conversations with BellSouth, it is apparent that BellSouth implemented the ADL FID requirement in March 1998, without prior (or subsequent) notice to AT&T. AT&T was thus left to "discover" the matter in May, after it had coded its systems for EDI-7 (without including the ADL FID codes, since they were not mandated by EDI-7 requirements). After discussions with BellSouth to resolve the problem proved unsuccessful, AT&T decided to make changes to its systems to send the ADL FID on all new and migration orders, in order that testing could resume.[41] AT&T thus updated its EDI mapping based on

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[40] (...continued)
abbreviated as "ADL," I shall use the term "ADL FID" whenever I am referring to the particular error that caused rejections during the UNE combination testing.

[41] See letter from Jill Williamson (AT&T) to Valerie Gray (BellSouth), dated June 24, 1998 (Attachment 18 hereto). The ADL FID requirement is discriminatory, because it requires AT&T to ask each and every customer whether they intend to keep any of their current lines. This (continued...)

BellSouth's changed requirements. AT&T sent its updated mapping to BellSouth on June 29, 1998, and asked that BellSouth provide it with any necessary modifications by June 30, 1998. By July 6, 1998, AT&T had received no response from BellSouth and once again asked BellSouth for feedback. On July 9, 1998, AT&T still had not heard from BellSouth and determined that the only way to find out whether its changes were correct was to submit orders to BellSouth.

76. On July 9, 1998, AT&T notified BellSouth of its intentions and sent over nine orders, which included ADL FIDs. Yet all of the orders were rejected. The rejection notices once again stated "ADL not furnished by CLEC," seemingly because AT&T's mapping was not correct. That same day, BellSouth finally called to advise AT&T that the mapping was not entirely correct and that BellSouth would be sending corrections to AT&T's mapping. This entire incident illustrated the unreliability of BellSouth's systems. At almost the same time as the orders were rejected, BellSouth advised AT&T by letter that its systems currently are incapable of receiving ADL FIDs -- a statement that totally contradicted BellSouth's reasons for rejecting the orders.[42]

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[41] (...continued)
imposes an enormous administrative burden on AT&T in its efforts to obtain customers. It is a requirement that BellSouth does not impose upon itself in trying to obtain customers.

[42] In a letter dated July 7, 1998 to CLECs, BellSouth Interconnection Services advised the CLECs that BellSouth was implementing an additional field in the local service request to include the ADL FID. See letter dated July 7, 1998, to All Competitive Local Exchange Carriers from BellSouth Interconnection Services (Attachment 19 hereto). BellSouth stated that "[t]his field is currently not available on LSRs delivered electronically using Electronic Data Interchange (EDI) or Local Exchange Navigation System (LENS). however it is under development and will be available in the future. You will be notified when the capability is available on EDI or LENS "
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